



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



RCRA RECORDS CENTER
FACILITY Proctor & Whitney - Main St
I.D. NO. CTD990672081
FILE LOC. R-1B
OTHER RDMS#2538

December 15, 1982

Mr. William Torrey
Chemical Engineer
U.S. EPA - Waste Mngt. Branch
19th floor
JFK Federal Building
Boston, MA 02203

Dear Bill:

The following report was sent to P&WA to clarify some unresolved issues discussed at our November 4th meeting. The opinions stated resulted from an internal policy meeting between Barry, Ed, and myself.

Sincerely,

George Dews
Sanitary Engineer
Hazardous Waste Management Section

GD:et
enclosure

Phone:

State Office Building, Hartford, Connecticut 06115

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**UNITED
TECHNOLOGIES
PRATT & WHITNEY
AIRCRAFT**

DEC 10 1982
400 Main Street
East Hartford, Connecticut 06108

Manufacturing Division

December 7, 1982

Mr. William Torrey III
U.S. Environmental Protection Agency
John F. Kennedy Federal Building
Boston, Massachusetts 02203

RE: RCRA Part B Application
Pratt & Whitney Aircraft
EPA ID # CTD 990672081

Dear Bill:

This letter is written as a follow-up to your November 4, 1982 visit at our East Hartford Facility. During this visit we discussed the scope of the referenced permit application as it pertained to this site. There were two areas which were left unresolved.

The first area of concern was the applicability of the exclusions granted under 40CFR 122.21(d)(2)(vi) and 40CFR 264.1(g)(6) for elementary neutralization or wastewater treatment units for several treatment and storage tanks at our concentrated waste treatment facility and dilute wastewater pretreatment facilities. Attached please find a chart which lists all tanks which store or treat hazardous wastes at this RCRA site. Also we have indicated which tanks are subject to regulation under Section 402 of the Clean Water Act and are therefore entitled to the above mentioned exclusions under RCRA Regulations.

The second area was the Reclaim Area which distills perchloroethylene and 1,1,1 trichloroethane. This area also reclaims various oils. All hazardous wastes are received primarily in portable tanks but occasionally in 55 gallon drums. The waste is transferred as soon as practical (usually the same day but possibly longer) into the appropriate still feed tank. The reclaimed solvent goes to a receiving tank where it is pumped to bulk storage tanks. The bottoms are removed from the stills and placed in 55 gallon drums which are labeled and transferred to the Concentrated Waste Treatment Area for storage. There is no storage occurring in the reclaim area since the feed tanks are a part of the reclaim system and the waste containers are considered in transit until emptied.

Please review these items and notify me of your concurrence no later than January 7, 1983. If you disagree with either of the above position please notify me as soon as possible so that we may resolve the problem. If you have any questions or need further information please contact me at (203) 565-2016.

Thank you for your courtesy and cooperation.

Sincerely,

A handwritten signature in cursive script, appearing to read "M. A. Andrew".

M. A. Andrew
Environmental Protection Group

MAA/h1

cc: Mr. George Dews
Connecticut DEP

HAZARDOUS WASTE TREATMENT & STORAGE TANKS

PRATT & WHITNEY AIRCRAFT EPA ID # CTD 990672081

<u>Tank Identification and Use</u>	<u>EPA Handling Code</u>	<u>No. of Tanks</u>	<u>Capacity (gallons) (each)</u>	<u>EPA H.W. Nos.</u>	<u>Regulated by CWA</u>	<u>RCRA Exclusion</u>
Waste Cyanide Solution Storage	S02	1	2,800	F007, F009	No	No
	S02	1	4,000	F007, F009	No	No
Waste Alkali Solution Storage	S02	1	4,000	D002	Yes	Yes
Waste Chromium Solution Storage	S02	1	4,000	D007	Yes	Yes
Waste Acid Solution Storage	S02	1	2,000	D002	Yes	Yes
	S02	1	4,000	D002	Yes	Yes
Waste Solvent Storage	S02	1	4,000	F001, F002	No	No
Wax/Solvent Storage	S02	1	2,500	F001, F002	No	No
Chromium Solution Treatment	T24	1	2,000	D007	Yes	Yes
Acid Solution Treatment	T31	1	2,000	D002	Yes	Yes
Alkali Solution Treatment	T31	2	2,000	D002	Yes	Yes
Kolene Salt Treatment	T31	2	1,125	D002	Yes	Yes
Sludge Treatment	T31, T22	1	735	D002, F008	Yes	Yes
Dilute Chromium Wastewater Treatment	T24	1	15,900	D007	Yes	Yes
Dilute Cyanide Wastewater Treatment	T22	1	9,500	F007, F009	Yes	Yes
	T22	1	28,500	F007, F009	Yes	Yes

M. A. Andrew
11/19/82